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**To:** [Jen.Mark@epamail.epa.gov](mailto:Jen.Mark@epamail.epa.gov)  
**Date:** 2/5/2013 12:13:58 PM  
**Subject:** Re: Fw: Donlin Gold Project - Cooperating Agency Scoping Meeting - February 6 (1pm to 4 pm Alaska Time)

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Also, I checked with the Donlin Overview power point and the project will include the processes subject to the gold mine rule.

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Mark Jen---02/05/2013 10:44:46 AM---Thanks Madonna! For clarification, the Title V operating permit to be issued by ADEC would be where

From: Mark Jen/R10/USEPA/US  
To: Madonna Narvaez/R10/USEPA/US@EPA,  
Date: 02/05/2013 10:44 AM  
Subject: Re: Fw: Donlin Gold Project - Cooperating Agency Scoping Meeting - February 6 (1pm to 4 pm Alaska Time)

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Thanks Madonna!

For clarification, the Title V operating permit to be issued by ADEC would be where the applicant has to meet the final mercury limits for a new source? Right? Are there any specific requirements that the applicant has to meet in order to comply with the mercury standards? Does EPA have oversight/review responsibilities for the Title V permit?

Do you know what is meant by "with mercury retorts" and "without mercury retorts" ? I am assuming this is the industry language?

Thanks

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Madonna Narvaez---02/05/2013 09:02:35 AM---Hi, Mark. I looked over the list of potential permits and licenses needed, and noted that a 40 CFR P

From: Madonna Narvaez/R10/USEPA/US  
To: Mark Jen/R10/USEPA/US@EPA  
Date: 02/05/2013 09:02 AM  
Subject: Re: Fw: Donlin Gold Project - Cooperating Agency Scoping Meeting - February 6 (1pm to 4 pm Alaska Time)

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Hi, Mark. I looked over the list of potential permits and licenses needed, and noted that a 40 CFR Part 70 (Title V) permit was not listed. They would get that from ADEC. That would be after any permit to construct they received. I'm going to include language from the factsheet for 40 CFR Part 63 Subpart 7E that covers gold mine production and processing.

The final rule establish mercury emissions limits for four types of processes found at gold production facilities: ore-

9/13/2018

pretreatment processes (primarily heating processes used to prepare ore for gold extraction); carbon processes with mercury retorts; carbon processes without mercury retorts; and non-carbon concentrate processes. (The latter three processes separate gold from ore.) The final emissions limits are based on the existing emissions level of the best-performing U.S. facilities, which are well-controlled for mercury.

The final mercury limits are as follows:

Affected Source	Existing Sources	New Sources	Units
Ore pretreatment processes	127	84	lb/million tons of ore
Carbon processes with mercury retorts	2.2	0.8	lb/ton of concentrate
Carbon processes without mercury retorts	0.17	0.14	lb/ton of concentrate
Non-carbon concentrate processes	0.2	0.1	lb/ton of concentrate

**§ 63.11640 Am I subject to this subpart?**

(a) You are subject to this subpart if you own or operate a gold mine ore processing and production facility as defined in § 63.11651, that is an area source.

(b) This subpart applies to each new or existing affected source. The affected sources are each collection of "ore pretreatment processes" at a gold mine ore processing and production facility, each collection of "carbon processes with mercury retorts" at a gold mine ore processing and production facility, each collection of "carbon processes without mercury retorts" at a gold mine ore processing and production facility, and each collection of "non-carbon concentrate processes" at a gold mine ore processing and production facility, as defined in § 63.11651.

(1) An affected source is existing if you commenced construction or reconstruction of the affected source on or before April 28, 2010.

(2) An affected source is new if you commenced construction or reconstruction of the affected source after April 28, 2010.

(c) This subpart does not apply to research and development facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA).

(d) If you own or operate a source subject to this subpart, you must have or you must obtain a permit under 40 CFR part 70 or 40 CFR part 71.

An area source emits less than 10 tpy of a single hazardous air pollutant (HAP), or less than 25 tpy of a collection of HAPs. So their emission inventories should also include the amount of and identification of HAPs emitted by their proposed processes.

Please let me know if this is what you need. Thanks!

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9/13/2018

Hi Madonna,

How are you doing today?

Do you have any language that I can provide regarding compliance with the new mercury final rule and meeting the NESHAP? Is this something that EPA will regulate or ADEC?

I would like the Donlin Gold Project EIS to include information that demonstrates compliance with this new standard requirement for gold ore processing and production facility. Thanks

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----- Forwarded by Mark Jen/R10/USEPA/US on 02/04/2013 08:38 AM -----

From: Mark Jen/R10/USEPA/US  
To: Cindi Godsey/R10/USEPA/US@EPA, Tami Fordham/R10/USEPA/US@EPA, Phil North/R10/USEPA/US@EPA, Matthew LaCroix/R10/USEPA/US@EPA, Lorraine Edmond/R10/USEPA/US@EPA, Herman Wong/R10/USEPA/US@EPA, Chris Eckley/R10/USEPA/US@EPA, Madonna Narvaez/R10/USEPA/US@EPA, Elizabeth McKenna/R10/USEPA/US@EPA  
Cc: Christine Reichgott/R10/USEPA/US@EPA, Dianne Soderlund/R10/USEPA/US@EPA  
Date: 01/29/2013 04:09 PM  
Subject: Donlin Gold Project - Cooperating Agency Scoping Meeting - February 6 (1pm to 4 pm Alaska Time)

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Greetings Everyone!

As mentioned previously, the Donlin Gold Project EIS Cooperating Agency Scoping Meeting is scheduled for...

Proposed Date: Wednesday, February 6, 2013;

Proposed Time: 1 pm to 4 pm Alaska Time (2 pm to 5 pm Pacific Time);

Proposed Venue: BLM Campbell Creek Science Center, Anchorage (Webinar or teleconference line to be provided);

Proposed Agenda: 1 - 2 pm Donlin Gold LLC will present a "Donlin 101 Presentation" (in greater detail)

2 - 4 pm Agency questions regarding the project

URS will summarize scoping comments heard at public meetings

Agency scoping issues

The final agenda and format should be determined by early next week and materials to be sent out prior to the meeting.

### **EPA Scoping Issues**

As identified a few weeks ago, please provide your project scoping issues/concerns to me by this Friday, February 1. In preparation for the meeting on February 6, I am asking for a bulleted list of your scoping issues/comments that we would share with the EIS development team as a heads up to what EPA will be providing in our detailed formal Scoping Comments due to the Corps of Engineers on March 29, 2013. Please be very specific in identifying your scoping issues/comments and what you are asking the EIS to provide. For example, if mercury emissions are a concern, then specify the EIS should provide estimates of mercury emissions from the processing emission stacks, and from fugitive mercury from the tailings storage facility, etc.

After I receive your bulleted list of scoping issues/comments, I will compile them and send it to everyone for review prior to the February 6 meeting. If you are able to participate the February 6 meeting, then please feel free to raise your issue/comment. If you are not able to participate in the meeting, then I will raise the issue/concern on your behalf, if time allows. The significant issues/concerns would include - mercury emissions, acid rock drainage/metal leaching, chemical management, spill prevention, planning and response, wetlands and fisheries impacts, impacts to subsistence resources and access, financial assurance, etc.

I will try and talk to everyone this week to clarify what I am asking for by February 1. Thanks.

9/13/2018

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